

## Fred Stevens

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**From:** Jeff Brenner <jbrenner@maragell.com>  
**Sent:** Monday, August 31, 2015 11:24 AM  
**To:** Herman Segal  
**Cc:** Fred Stevens; Christopher Reilly  
**Subject:** RE: Privileged Files

Herman,

I'll have Steve redact them from the production for the time being. I suspect the Trustee will challenge your late response, as well as the designations themselves, so I copied Fred and Chris on this reply so they can begin the process.

Jeff

*Jeffrey Brenner, Esq., NJLPI*

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**From:** Herman Segal [mailto:[segalherman@gmail.com](mailto:segalherman@gmail.com)]  
**Sent:** Monday, August 31, 2015 11:10 AM  
**To:** Jeff Brenner  
**Subject:** Privileged Files

Jeff,

Attached are the files that I believe are privileged, (and the reasons why I believe they are privileged) and should not be handed over to the trustee:

Line 47, 48, 49, 50, 51, & 52:

/F/\$Recycle.Bin/S-1-5-21-710320885-4184985584-152471938-1001/DOSHI DIAGNOSTIC.zip/APS MISC/Audrie Br  
/F/\$Recycle.Bin/S-1-5-21-710320885-4184985584-152471938-1001/DOSHI DIAGNOSTIC.zip/APS MISC/Audrie Br  
/F/\$Recycle.Bin/S-1-5-21-710320885-4184985584-152471938-1001/DOSHI DIAGNOSTIC.zip/APS MISC/ScriptChe  
/F/\$Recycle.Bin/S-1-5-21-710320885-4184985584-152471938-1001/DOSHI DIAGNOSTIC.zip/APS MISC/ScriptChe  
/F/\$Recycle.Bin/S-1-5-21-710320885-4184985584-152471938-1001/DOSHI DIAGNOSTIC.zip/APS STATUS.xls  
/F/\$Recycle.Bin/S-1-5-21-710320885-4184985584-152471938-1001/DOSHI DIAGNOSTIC.zip/DR. AHMED/Audrie

These are medical files of someone named Audrie Brooks and are HIPPA protected.

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Line 71:

/F/Users/Herman/Desktop/Retainer (1).pdf

This is a retainer agreement that I hired an attorney regarding the foreclosure on the Miami Co-op and should be protect

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Line 60 & Line 115 & Line 168:

/F/Panasonic/Panasonic-DMS/Port Controller/Network Scan Data/Centurion Settlements 12-31-11 statement.pdf

/F/Users/Herman/Documents/Downloads/Centurion January.pdf

/F/Users/Herman/Documents/oct 162 w.doc

These are possibly Altered Bank Statements. They are protected under the 5th Amendment.

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Line 186:

/F/Users/Herman/Documents/Segal, Herman - Relentless Energy Investment bill 4-16-13.pdf

This is a retainer agreement that I hired an attorney and should be protected under atty client privilege

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Line 224:

/F/Users/Yocheved Segal/Documents/Downloads/Documents/Eagle Park L & T Answer -Shapiro .pdf

These have my handwritten notes on an attorney communication, and should be protected under atty client privilege.

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Line 229

/F/Users/Yocheved Segal/Documents/Downloads/Documents/Retainer Bronstein Executed.pdf

This is a retainer agreement that I hired an attorney and should be protected under atty client privilege

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Line 230

/F/Users/Yocheved Segal/Documents/Downloads/Documents/Ryerson agreement.pdf

This Document may be a document that was never executed and the purported signatures are possibly forged.

This Document is protected under the 5th Amendment.

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Line 233:

/F/Users/Yocheved Segal/Documents/Fax cover page.docx

This Document may be a document that was possibly forged.

This Document is protected under the 5th Amendment.

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Line 242

/F/Users/Yocheved Segal/Documents/Legal documents/02 10 15 Retainer Letter.pdf

This is a retainer letter between my wife and her attorney and is protected for various reasons.

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There are many other items that the Trustee is not entitled to, but I don't have the time nor strength to fight every instance.

Of course I reserve my rights to assert privilege in the future, and this should in no way be perceived as a waiver of any rights without their knowledge.

Cordially,  
Herman